## REMARKS

Request for Reconsideration

Applicant has carefully considered the matters raised by the Examiner in the outstanding Office Action but remains of the opinion that patentable subject matter is present. Applicant respectfully requests reconsideration of the Examiner's position based upon the following remarks.

Claims Status

Claims 1, 4-9, 11-15, 18-23 and 25-28 are currently under examination in this Application.

Rejection

Claims 1, 4-9, 11-15, 18-23 and 25-28 had been rejected as being anticipated by Tateyama.

With respect to Tateyama there are two primary issues which Applicant wishes to address. First, Applicant wishes to address the issue of a claim limitation that the first controller automatically controls the image recording device. In the Office Action, the Examiner takes the position that the end point address (EPA) and the start point address (SPA) of the print cycle as recited in paragraph 465 meets the automatic limitation of the present Invention. Applicant respectfully disagrees.

In the present Invention, each one of the independent claims, Claims 1, 9, 15, and 23 require that the first controller automatically controls the image recording device. This aspect of the present Invention is brought out in the paragraph bridging pages 17 and 18 of the Application. In simple terms, because the first controller automatically controls the image recording device, it insures that the image recording device always has images to record. This means that the image recording device is not idle during times when there are images in the memory which can be recorded.

The Examiner will appreciate that this is beneficial especially in a hub-spoke arrangement. In a hub-spoke arrangement, the hub contains a printing device, i.e. an image recording device, and at each one of the ends of the spoke has a memory that contains images that need to be printed. Physically, these memories are located in a small retail store where someone has dropped off their film or their CD with images thereon. The small retail store at the end of spoke loads the pictures or the images from the CD into the memory. Those images wait for the controller to call them up for printing by the printer which is located at the hub. The first controller, which is located at the hub with the printer, can automatically go out to the second controller, located at the retail store with the memory and pull the images that are stored in the memory for printing. This allows a large capacity printing device which is located at the hub to handle multiple memories or retail stores located at the spokes, no matter what time of day or night. The printer is not waiting for a command from a user to print but can be kept active all night long while the first controller goes out and finds images that

need to be printed. In this way, the first controller automatically controls the image recording device and keeps the image recording device active.

This can be contrasted against the teachings of Tateyama because in Tateyama EPA and SPA are unrelated to any sort of automatic recording of images. As explained in paragraphs 462-469 and shown in Figure 70 of Tateyama, EPA and SPA indicate the beginning and end of consecutive print cycles, see ci-1, ci and ci+1 established by printer 1102. When the current recording cycle ci is complete, confirmation is sent from printer 1102 to receiving device 1101 to indicate that the next recording cycle ci+1 can begin (step S6, paragraphs 465, 467 and 469). Once confirmation of recording cycle ci is received, receiving device 1101 transfers image data from memory 13 to printer 1102 and the image data is used during recording cycle ci+1 (step S10). The beginning or ending of the step do not cause the controller to automatically go out and obtain other images from a second location for printing. EPA and SPA really define the beginning and end of a print cycle used during the address transfer step, the data transfer request step and the data transfer step between printer

1102 and receiving device 1101 as shown in Figure 70. Thus, the controller at the printer 1102 does not go out and seek images in a distant memory so as to keep its image recording device active, rather, it simply advises the controllers at the memory that printing is completed. This advises the recordation device 1101 that space is available on the memory and allows the recordation device to send data to the memory of the printer.

This process does not control the printing in an automatic way as in the present Invention.

The second issue that Applicant wishes to address is the priority issue. The Examiner takes the position that confirmation of the print cycle, (ci-1, ci and ci+1) disclosed on page 23 in paragraph 469, meets the priority data limitation of the present Invention because the printing confirmation allows the next printing cycle to be performed.

The priority order in the present Invention means the desired date and hour for printing or recording. For example, a second set of image information entered in the memory after a first set of image information can be printed before the first set of image information provided that the second set is given a higher priority than the first set. Thus, recording or printing does not occur in the order in which the image information is inputted into the memory.

In contrast, Tateyama records in the order in which the image information is inputted into the frame memory 13. For example, printer 1102 records the first cycle ci and the second cycle ci+1, etc. Printer 1102 cannot record the second cycle ci+1 before the first cycle ci and Tateyama gives no information that recording can be performed based on priority order such as the date and time for printing. Thus, Tateyama does not give priority to anything but simply takes the data as it was inputted in the machine not based on some priority to which the data was assigned. Respectfully, Tateyama teaches nothing about priority processing.

Furthermore, it should be noted that Figures 13 and 15B refer to priority. However, in paragraph 135 of Tateyama, he recites asynchronous and isochronous data which can be mixedly transferred such that the isochronous data is transferred prior to the asynchronous data. Thus, there is a discussion with respect to priority concerning the transfer data for isochronous data and asynchronous data. In contrast, the present Invention has a first control means which sends image information reading command signals to the second controller at prescribed intervals based on certain rules, see page 3, lines 3-6 and page 28, line 24 through page 29, line 3 of the present Application.

Respectfully, Tateyama does not teach or suggest either that the first controller automatically controls the image recording device nor the priority aspects of the present Invention and, thus, as such the present Invention is patentable over Tateyama.

Conclusion

In view of the foregoing, it is respectfully submitted that the present Application is in condition for allowance, and such action is respectfully requested. Should any extensions of time or fees be necessary in order to maintain this Application in pending condition, appropriate requests are hereby made and authorization is given to debit account #02-2275.

Respectfully submitted,

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